ESTTA Tracking number:

ESTTA255579 12/17/2008

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| Proceeding | 91185094 | | |
|---------------------------|---|--|--|
| Party | Plaintiff Boston Red Sox Baseball Club Limited Partnership | | |
| Correspondence Address | Roberto Ledesma Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES rxl@cll.com, trademark@cll.com | | |
| Submission | Motion to Suspend for Settlement Discussions | | |
| Filer's Name | Roberto Ledesma | | |
| Filer's e-mail | rxl@cll.com, trademark@cll.com | | |
| Signature | /Roberto Ledesma/ | | |
| Date | 12/17/2008 | | |
| Attachments | n(stylized)MOTION.pdf (3 pages)(8134 bytes) | | |

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| In re Application Serial No. 77/288,8 | 30 | |
|---------------------------------------|---------------|-------------------------|
| Filed: September 25, 2007 | | |
| For Mark: N (Stylized) | | |
| Published in the Official Gazette: Ma | arch 11, 2008 | |
| | X | |
| | : | |
| BOSTON RED SOX BASEBALL | : | |
| CLUB LIMITED PARTNERSHIP, | : | |
| | : | |
| Opposer | ;, : | |
| | : | |
| v. | : | |
| | : | |
| JEAN SAGERIAN, | : | |
| | : | Opposition No. 91185094 |
| Applica | nt. : | |
| | | |

Commissioner of Trademarks Attention: Trademark Trial and Appeal Board P.O. Box 1451 Alexandria, VA 22313-1451

MOTION ON CONSENT TO CONTINUE SUSPENSION OF THE PROCEEDING AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED

Opposer, by and through counsel, hereby moves for an order to continue the suspension of the above-captioned proceeding for a period of six (6) months, until **June 17**, **2009**. Applicant consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

If the Board grants this motion, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceeding resumes

so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial and other periods should be reset accordingly.

Dated: New York, New York December 17, 2008

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C. *Attorneys for Opposer*

By /Roberto Ledesma/
Mary L. Kevlin
Richard S. Mandel
Roberto Ledesma
1133 Avenue of the Americas
New York, New York 10036-6799
(212) 790-9200

CERTIFICATE OF SERVICE

| I hereby certify that I caused a copy of the foregoing MOTION ON CONSENT to be sent via |
|---|
| EMail as agreed by the parties to Applicant who is also Applicant's Correspondent, Jean |
| Sagerian, at Northgatekids@aol.com on December 17, 2008. |

/Roberto Ledesma/ Roberto Ledesma